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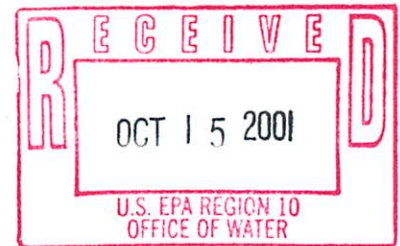
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October 11, 2001
PMX# 216-1598-012 (01/01)

Mr. Jeff Kenknight
USEPA, Region 10
1200 Sixth Avenue
Seattle, WA 98101



Re: Underground Injection Control Program

Dear Mr. Kenknight:

Thank you for your telephone conversation on September 24, 2001. I wanted to take this time to:

- Confirm my understanding of our conversation regarding a rapid infiltration basin, and
- Request EPA's concurrence on a permit by rule assuming underground disposal of effluent using perforated pipes or a similar system such as drip emitters.

As you may recall, my earlier questions were:

- Does a rapid infiltration basin qualify under the Underground Injection Control (UIC) Program?
- If so, is it permitted under rule or will a specific permit be required?

It appears that it is EPA's collective interpretation that a rapid infiltration basin is not an injection well and therefore does not fall under either the UIC program or the NPDES permit program. It is my understanding that a specific permit for this project is therefore not required. If my understanding is incorrect, please contact me at your earliest convenience. I have also passed your request to receive a courteous set of documents along to The Tribes, with a recommendation that it would be advantageous to have another "set of eyes" review the documents.





Mr. Jeff Kenknight
October 11, 2001
Page 2

As an option to rapid infiltration basins, we are also reviewing the alternative of perforated pipes or some other similar form of subsurface effluent disposal. Similar types of disposal may include drip emitters or small diameter pressure distribution lines. I recall that underground perforated pipes fall under the UIC Program. This leads to a series of additional questions, as follows, to which I would appreciate a response:

- If The Tribes use perforated pipes, would a specific permit be required or would the injection well be permitted by rule?
- If drip emitters or vulcanized rubber tubes are used, would the injection well fall under the UIC program and would a specific permit be required, or would they be permitted by rule?

I would greatly appreciate your response to these questions.

Very truly yours,

PARAMETRIX, INC.

Michael Ollivant

cc: Mr. Tom McKinsey – The Tulalip Tribes
Mr. Ken Fellows P.E. – Parametrix